



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza,
New York 10007*

October 20, 2023

BY ECF

The Honorable Laura Taylor Swain
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street,
New York, New York 10007

Re: United States v. Renwick Haddow, 19 Cr. 340 (LTS)

Dear Judge Swain:

The Government respectfully writes on behalf of the parties in advance of the October 27, 2023 control date set forth in the Court's Order dated April 19, 2023 (ECF No. 63). Since the Court's Order, the Government has extradited from Spain co-conspirator David Kennedy, and is in the process of extraditing co-conspirator James Robinson under the docket *United States v. Robinson, et al*, 21 Cr. 344 (LAK) (S.D.N.Y.). On October 13, 2023, Kennedy pleaded guilty pursuant to a plea agreement. Kennedy's sentencing is scheduled for January 31, 2024 at 11:30 a.m. before the Honorable Lewis A. Kaplan.

The Government's investigation remains ongoing, including through the above-captioned prosecution and the Government's continuing efforts to recover funds for victims domestically and abroad. The defendant's active cooperation is expected to continue for the next six months. Accordingly, the parties request that sentencing and all associated sentencing submissions and presentencing report deadlines continue to be adjourned, and for a new control date to be scheduled six months from now on a date convenient to the Court.

Finally, the parties respectfully submit a proposed Consent Preliminary Order of Forfeiture as to specific property and a money judgment in the amount of \$57,579,790.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:



Vladislav Vainberg
Assistant United States Attorney
Tel. (212) 637-1029

cc (by ECF): Edward J.M. Little, Esq.
John McGoey, Esq.